



Date: September 1, 2006

To: WDB Directors
Job Service Directors
Job Service Supervisors
ASSET User Group Representatives

From: Gary Denis
Acting Bureau Director
Bureau of Workforce Programs

Subject: **WIA Policy Update 06-10 - Social Security Number Verification and Validation**

Purpose

This policy update provides guidance on Social Security Number (SSN) verification and validation for Workforce Investment Act (WIA) Title 1, Trade Adjustment Assistance (TAA) participants, WIA Title 3 Veterans program participants and WIA Title 3 customers.

Legislative/Regulatory/Policy References

- Training and Employment Guidance Letter (TEGL) 17-05: Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues
- Workforce Investment Act 20 CFR s. 666

Background

The U.S. Department of Labor (U.S. DOL) published TEGL 17-05 in February 2006. Per DOL, States are permitted to exclude any participant with either an invalid or a missing SSN from the performance measures. A valid SSN is needed because nearly all U.S. DOL-required performance measures require a cross-match with Unemployment Insurance (UI) Wage Record data. SSNs are used to find wage record information in the UI database.

Individuals who apply for services in WIA Title 1, Title 3 and TAA are not required to disclose a valid SSN. They should be encouraged to report valid SSNs to ensure program services are evaluated as completely as possible through U.S. DOL's performance reporting system.

In August 2006, SSN validation functionality was added to the Automated Systems Support for Employment and Training (ASSET) system. The SSN verification and validation process is performed through an interface in cooperation with the U.S. Social Security Administration. A Webinar was conducted in early August to introduce the process and preview the training videos that demonstrate this new functionality and how to validate a customer's SSN in ASSET.

Policy

At a minimum, all SSNs must be submitted to the Master Customer Index (MCI) for validation. If the SSN is returned as "Not Verified", DWS strongly encourages local staff to obtain valid SSNs for participants who receive services that put them into U.S. DOL's WIA Title 1 program performance measures. WIA Title 3 Labor Exchange and Veterans Service providers are encouraged to validate SSNs for customers who receive services beyond the self-service or informational level. TAA participant SSNs are validated by the UI Division and the Social Security Administration, so this policy does not affect TAA case managers.

To ensure consistency and accuracy over time, DWS recommends that SSN validation be handled by a small number of designated individuals. Workforce Development Boards (WDB) or other local program operators who choose to conduct SSN validation should have at least two (2) individuals trained to validate SSNs using the new ASSET validation function. Staff who have direct contact with customers, or have the ability to contact participants to verify their SSNs, are the most likely candidates to perform SSN validation activities.

While not all case managers are expected to know the ASSET SSN validation process, they can view either the Manage Alerts or ASSET System Reports sections that show when an invalid SSN has been returned by MCI. They should know the steps to follow to obtain valid information, but the decision to follow through is subject to local program discretion.

DWS staff will monitor performance measure exclusions due to invalid SSNs during PY06 to determine if verification should be required for WIA Title 1 and WIA Title 3 Labor Exchange and Veterans programs.

ASSET Reporting

Training is provided in the form of six (6) training videos and guidance in the on-line ASSET Help Manual. Please contact the ASSET Call Center at (608) 261-6317 (Option 3) to learn how to receive the training video or additional assistance.

Action Required

This policy is effective September 1, 2006. If you have any questions about this, please contact your Local Program Liaison.